

EXHIBIT 2

ALEXANDER STROSS, §
§
Plaintiff, §
§ Case No. 1:15-cv-00223-SS
v. §
§
REDFIN CORPORATION, §
§
§
Defendant/ §
Counterclaimant. §

ORAL AND VIDEOTAPED DEPOSITION OF
ALEXANDER STROSS
APRIL 20, 2016

ORAL AND VIDEOTAPED DEPOSITION OF ALEXANDER STROSS, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and numbered cause on the 20th day of April, 2016, from 9:04 a.m. to 3:01 p.m., before Cynthia Warren, Certified Shorthand Reporter for the State of Texas, reported by machine shorthand, at the offices of DepoTexas, 1016 La Posada, Suite 294, Austin, Texas 78752, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record.

01:24 1 Q. What did you do upon discovery of this alleged
01:24 2 infringement in February 2013?

01:24 3 A. I had my sister and my wife screen capture
01:24 4 every image that you were infringing on mobile platforms
01:24 5 and on your web-based system and also on social media
01:24 6 networks.

01:25 7 Q. About how many screen captures were made?

01:25 8 A. 6,000. 6- to 10,000.

01:25 9 Q. How long did that take?

01:25 10 A. A week.

01:25 11 Q. Did you do anything else during that week?

01:25 12 A. Yes. I ate, slept.

01:25 13 Q. Did you do anything else with regard to
01:25 14 Redfin's alleged infringement during that week?

01:25 15 A. I contacted my attorney and told my attorney
01:25 16 what was going on and asked for his advice.

01:25 17 Q. And was that attorney Mr. McKinney?

01:25 18 A. Yes.

01:25 19 Q. Did you ever contact ACTRIS to alert them to
01:26 20 Redfin's alleged infringement?

01:26 21 A. No, I have not filed any complaints with ACTRIS
01:26 22 regarding your alleged -- my alleged complaints.

01:26 23 Q. Did you ever contact Redfin regarding the
01:26 24 alleged infringement?

01:26 25 A. I have contacted Redfin regarding improper data

01:26 1 usage.

01:26 2 Q. Did you ever contact Redfin regarding the
01:26 3 alleged infringement?

01:26 4 A. I contacted my attorney and asked for his
01:26 5 advice and followed it.

01:26 6 Q. Did you ever contact Redfin regarding the
01:26 7 alleged infringement?

01:26 8 A. No.

01:26 9 Q. When you say you contacted Redfin regarding
01:27 10 improper data usage, when did that occur?

01:27 11 A. I don't know the specific date, but it was
01:27 12 within the last few months.

01:27 13 Q. And who at Redfin did you contact?

01:27 14 A. Customer service.

01:27 15 Q. Did you do that via e-mail?

01:27 16 A. Yes. It's been provided to you.

01:27 17 Q. What was the nature of the improper data usage
01:27 18 you complained of?

01:27 19 A. Redfin is publishing sold prices as public
01:27 20 record in Texas, and Texas is a nondisclosure state so
01:27 21 that violates the Texas nondisclosure law. And I
01:27 22 informed Redfin of that, but they continue to do so to
01:27 23 this day.

01:27 24 Q. Have you complained to anyone else about that
01:28 25 improper data usage?

Alexander Stross

131

1 UNITED STATES DISTRICT COURT
 2 WESTERN DISTRICT OF TEXAS
 3 AUSTIN DIVISION

4 ALEXANDER STROSS, §
 5 Plaintiff, §
 6 v. § Case No. 1:15-cv-00223-SS
 7 REDFIN CORPORATION, §
 8 Defendant/ §
 9 Counterclaimant. §

10 REPORTER'S CERTIFICATION
 11 DEPOSITION OF ALEXANDER STROSS
 12 APRIL 20, 2016

13 I, Cynthia Warren, Certified Shorthand Reporter in
 14 and for the State of Texas, hereby certify to the
 15 following:

16 That the witness, ALEXANDER STROSS, was duly sworn
 17 by the officer and that the transcript of the oral
 18 deposition is a true record of the testimony given by
 19 the witness;

20 That pursuant to FRCP Rule 30(f)(1), that the
 21 signature of the deponent:

22 X was requested by the deponent or a party at
 23 the completion of the deposition and returned within 30
 24 days from date of receipt of the transcript. If
 25 returned, the attached Changes and Signature Page
 contains any changes and the reasons therefor;

Alexander Stross

132

1 was waived by the deponent and/or attorneys at
2 the completion of the deposition;

3 That the amount of time used by each party at the
4 deposition is as follows:

5 Mr. Joel B. Ard - 3 hours, 19 minutes
6 Mr. Robert Buckner McKinney - no time used

7 That \$_____ is the deposition officer's
8 charges to the Defendant/Counterclaimant for preparing
9 the original deposition transcript and any copies of
10 exhibits;

11 I further certify that I am neither counsel for,
12 related to, nor employed by any party in this cause, and
13 further that I am not financially or otherwise
14 interested in the outcome of the action.

15 Certified to by me this 25th day of April, 2016.

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Cynthia Warren
CYNTHIA WARREN, Texas CSR 4597
Expires 12/31/17
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